

**C. Marie Eckert**, OSB No. 883490  
marie.eckert@millernash.com  
**Suzanne C. Lacampagne**, OSB No. 951705  
suzanne.lacampagne@millernash.com  
MILLER NASH GRAHAM & DUNN LLP  
3400 U.S. Bancorp Tower  
111 S.W. Fifth Avenue  
Portland, Oregon 97204  
Telephone: (503) 224-5858  
Facsimile: (503) 224-0155

**Roger R. Martella, Jr.**  
rmartella@sidley.com  
**Quin M. Sorenson**  
**Benjamin E. Tannen**  
*(to be specially admitted)*  
SIDLEY AUSTIN LLP  
1501 K Street, N.W.  
Washington, D.C. 20005  
Telephone: (202) 736-8000  
Facsimile: (202) 736-8711

Attorneys for Proposed Intervenor-Defendants  
The National Association of Manufacturers  
American Fuel & Petrochemical Manufacturers  
American Petroleum Institute

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
EUGENE DIVISION

**KELSEY CASCADIA ROSE JULIANA**, et  
al.,

Case No. 6:15-cv-01517-TC

Plaintiffs,

v.

**UNITED STATES OF AMERICA**, et al.,  
Defendants.

**DECLARATION OF DR. CHAD  
MOUTRAY OF THE NATIONAL  
ASSOCIATION OF  
MANUFACTURERS IN SUPPORT OF  
PROPOSED INTERVENOR-  
DEFENDANTS' MOTION FOR  
INTERVENTION**

I, Dr. Chad Moutray, hereby declare as follows:

1. I make this declaration in support of the motion filed by the National Association of Manufacturers (NAM) to intervene in the above captioned case. In this case, Earth Guardians, twenty-one individuals, and “Future Generations” acting by and through their guardian James Hansen (collectively Plaintiffs) have asked this Court to issue an injunction forcing the United States and nine federal agencies (collectively Defendants) to prepare and implement an:

[E]nforceable national remedial plan to phase out fossil fuel emissions and draw down excess atmospheric CO<sub>2</sub> so as to stabilize the climate system and protect the vital resources on which Plaintiffs now and in the future will depend....

First Amended Complaint for Declaratory and Injunctive Relief at Prayer for Relief at ¶7, *Juliana v United States*, No. 6:15-cv-01517-TC (D. Or. Sept. 10, 2015) (First Amended Complaint). Plaintiffs are requesting that the Court order Defendants to comply with this injunction in a manner that “swiftly phase[s] out CO<sub>2</sub> emissions” and that the Court order any other action “necessary to ensure that atmospheric CO<sub>2</sub> is no more concentrated than 350 ppm by 2100....” First Amended Complaint at ¶12. To achieve this goal, Plaintiffs are calling for measures that will ensure “a near-term peak in CO<sub>2</sub> emissions and a global reduction in CO<sub>2</sub> emissions of at least 6% per year....” *Id.* at ¶258.

2. The purpose of this declaration is to provide my testimony on the impacts on the National Association of Manufacturers’ members should Plaintiffs be successful in forcing the economy-wide sea change in energy policy that they are seeking.

### **I. Qualifications and Background**

3. I am currently chief economist at the National Association of Manufacturers . In this role, I serve as the NAM’s economic forecaster and spokesperson on economic issues. I contribute forecasts, insights and opinions about U.S. economic trends and policies through

quarterly surveys and interviews that focus on financial and industry trends and policies impacting America's industrial base and its ability to contribute to job creation and global competitiveness. I have studied the impacts of higher costs, including those arising from new regulations, taxes and increased liability under the legal system, on the ability of U.S. manufacturers to compete in the global economy. A true and accurate copy of my resume is attached as Attachment 1.

4. I spent the year prior to joining the NAM in April 2011 as president of Pinchfield Consulting & Analytics, LLC where I conducted economic research and analysis, much of which was focused on the issues faced by franchisors and franchisees.

5. From 2002 through 2010, I worked at the U.S. Small Business Administration (SBA), Office of Advocacy, first as Director of Economic Research and then as Chief Economist. I was directly responsible for the development and administration of the SBA's economic research agenda as it related to the role that entrepreneurs play in the economy and policy-relevant issues that are central to small business owners. I was responsible for increasing the awareness of the Office of Advocacy and its research, which included coordinated outreach with academics and policymakers and numerous speeches on small business economic trends.

6. Before my work at SBA, I spent roughly a decade in academia, which was capped by being named Dean of the School of Business Administration at Robert Morris College in Chicago, Illinois (now Robert Morris University of Illinois, effective May 2009) in 1997. I served in that role through late 2002.

7. I received my Ph.D. in Economics in 1996 from Southern Illinois University at Carbondale. I received an M.A. and B.A. in economics from Eastern Illinois University and an A.S. in Business Administration from Lake Land Community College.

## **II. National Association of Manufacturers**

8. The National Association of Manufacturers is the nation's largest industrial trade association, representing small and large manufacturers in every industrial sector and in all 50 states. The NAM's mission is to enhance the competitiveness of manufacturers by shaping a legislative and regulatory environment conducive to U.S. economic growth and to increase understanding among policymakers, the media and the general public about the vital role of manufacturing to America's economic future and living standards. The NAM and its members are strongly affected by laws governing the manufacturing sector and regulatory restrictions on development, emissions and manufacturing. The NAM's members are already subject to many regulations addressing air emissions, including a number that focus squarely on GHG emissions.

9. The economic effects that would result from requiring sweeping measures to reduce GHG emissions are of great concern to the NAM. The NAM Board of Directors, a group of more than 200 representatives from member companies throughout the country, voted in 2008 in support of the following policy on the regulation of GHG emissions:

### **Climate Change**

The NAM understands the fundamental importance of protecting the environment. Our member companies are committed to greater environmental sustainability, including energy efficiency and conservation and reducing greenhouse gas emissions associated with global climate change. We know we cannot solve the climate change issue alone. The U.S. Congress must engage in a thorough and transparent deliberative process for establishing federal climate change policies to reduce greenhouse gas emissions, while maintaining a competitive level playing field for U.S. companies in the global marketplace. These Principles can help us achieve that goal.

## **III. The NAM's Members**

10. The NAM has more than 14,000 members across all major industrial sectors of the U.S. economy. The NAM's members include many of the leading members of the coal, oil

and natural gas sectors, petroleum refiners, and petrochemical producers. Hundreds of the NAM's members have indicated that they conduct oil and gas extraction or conduct petroleum and coal products manufacturing, and over 150 members have indicated those areas represent their primary business. Further, the NAM's members also make tools and equipment that are used in the production and refining of conventional fuels. In addition, many of the NAM's members directly emit greenhouse gases either as a product of their manufacturing processes or through the combustion of fuels at their facilities. Finally, most, if not all, of the NAM's manufacturing companies are heavily reliant on the availability of reasonably-priced and reliable energy.

#### **IV. The Manufacturing Sector**

11. The manufacturing sector produces \$2.1 billion of value each year, or 12.0 percent of U.S. gross domestic product, employing 12.3 million workers. In addition, nearly 6 million employees are indirectly employed by the other sectors as a result of manufacturing activity. Manufacturers account for roughly 60 percent of U.S. exports and perform three-quarters of private-sector research and development in the country, which is critical to our nation's long-term productivity growth and economic viability.

12. Manufacturing has bounced back after the Great Recession, with value-added in the sector rising from \$1.73 trillion in 2009 to \$2.09 trillion in 2014. Employment has also been positive, with manufacturers adding 865,000 workers since March 2010. Still, it is worth noting that manufacturing employment remains roughly ten percent below its pre-recessionary levels, as firms have become much more lean in their production since then.

13. Manufacturers have a renewed sense of spirit since the recession, with more businesses seeing the United States as a viable locale to produce their goods. Part of this is due to

increased relative efficiencies and improved quality in American-made products; while others have sought to increase their investments in the U.S. in light of our newfound energy abundance. In fact, in 2014, foreign direct investment in manufacturing exceeded \$1 trillion for the first time ever, with much of that stemming from lower feedstock costs from natural gas. Indeed, the American Chemistry Council currently estimates that there are 246 announced ventures in plastics, chemicals and fertilizer over the past few years as a result of more energy production, and more than 60 percent of those ventures are from non-U.S. companies.

14. At the same time, manufacturing production has been more sluggish over the past year. Headwinds from a strong U.S. dollar, weaknesses abroad, and lower crude oil prices have combined to dampen overall demand and output in the sector. Manufacturing production has declined from a more-robust 4.3 percent pace of growth year-over-year in January to just 1.4 percent in September, and job creation has slowed to a crawl. This compares to the second half of 2014, when manufacturers were adding roughly 20,000 workers per month on average. Nonetheless, manufacturers remain cautiously optimistic about the future, with expectations of two percent growth in sales and production over the next 12 months, according to the latest NAM Manufacturers' Outlook Survey. Exports are anticipated to be quite weak, however.

15. The NAM survey also found that the business climate was seen as the top challenge for manufacturers, cited by 79.4 percent of respondents. This included a desire for comprehensive tax reform and for reduced regulatory burdens. Rising health insurance costs were close behind, with 77.5 percent noting this as a concern.

**V. Impact of Plaintiffs' Proposed GHG Regulation on the Manufacturing Sector**

16. If Plaintiffs succeed in eliminating or massively reducing U.S. conventional fuel consumption and imposing other severe restrictions on GHG emission limits, the impact on the NAM's members will be significant and varied.

17. The dramatic reductions in conventional fuels that Plaintiffs seek is clearly a central business concern to the NAM's members that are oil, coal and natural gas producers, petroleum refiners, and petrochemical producers, and to those manufacturing companies that make the tools and components critical to such industries. The short-term impacts of the Plaintiffs' demands—a near-term peak in CO<sub>2</sub> emissions and then a 6% annual reductions in CO<sub>2</sub> emissions—would immediately harm these companies. Further, if Plaintiffs are successful in forcing the ultimate elimination of conventional fuels, these companies will presumably need to find new lines of business in order to survive and/or move their operations to other countries that do not impose similar restrictions and controls on conventional fuels.

18. Further, Plaintiffs' demands have the potential to harm the NAM's members that rely on conventional fuels to power their manufacturing processes. These businesses have significantly invested in the infrastructure necessary to effectively and efficiently utilize, transport and combust particular conventional fuels. Further, many companies directly emit GHGs either through energy combustion or through manufacturing processes themselves. The elimination of conventional fuels would require these NAM members—at a minimum—to re-engineer their manufacturing processes and invest substantial capital, frequently at the cost of hundreds of millions if not billions per facility, in converting their facilities to new sources of power, assuming alternative reliable energy were even available.

19. The unprecedented GHG reductions that Plaintiffs are seeking will harm the U.S.



manufacturing sector by driving up input costs for manufacturers. Requiring GHG emitters in the aggregate to meet a near-term GHG cap and then reduce emissions by 6% per year will likely drive up business costs, as companies scramble to achieve those reductions. The costs incurred in other sectors of the economy from these new regulations, such as the utility sector (which faces far less global competition than the manufacturing sector) will be transferred to the manufacturing companies, regardless of whether they are emitters of GHG, through higher electricity costs. These higher costs, which are outside the control of manufacturers, will exacerbate a global competitive disadvantage that is currently a significant problem for manufacturers operating in the United States. If Plaintiffs are successful in their suit, the dramatic GHG restrictions they propose will likely add overwhelming costs on U.S. manufactures that will reduce further their global competitiveness and market share both domestically as well as in other economies. As a less competitive location to produce, the U.S. manufacturing sector will be smaller and employ fewer workers, as companies will be encouraged to locate facilities and operations in other countries outside the regulatory reach of the United States.

20. A study by the American Council for Capital Formation and the NAM showed the impact on the economy from higher energy prices. While the study's focus was on the effects of higher energy prices from the cost of emission allowances associated with climate change policy, the major finding of the study—that higher energy prices reduces U.S. employment—is relevant to Plaintiffs' proposed GHG reduction requirements, since the reductions will increase the cost of energy, a structural non-production cost, on U.S. manufacturers.

21. Manufacturing is the most globally engaged and influenced sector of the U.S. economy. In contrast to most other major sectors of the economy, which may face competition



from, or attempt to increase sales to, another area of the state or country, U.S. manufacturers face competition and opportunities from around the world. This engagement has increased significantly over the past few decades.

22. For instance, in 1972, 8 percent of U.S. manufacturing production was exported to markets abroad, while imports accounted for 8 percent of domestic purchases of manufactured products. By 2008, more than a quarter of U.S. manufacturing was exported while imports increased to 38 percent of domestic purchases of manufactured products. With U.S. manufacturing being more trade-sensitive than other sectors of the economy, increasing cost on U.S. manufacturers, without offsetting productivity increases, will reduce U.S. manufacturers' global competitiveness which will lead to higher import penetration and lower exports. Together, these effects will lower the level of domestic manufacturing output and employment.

23. Making the United States a more expensive place to build and operate a manufacturing plant, as well as disrupting reliable sources of energy and infrastructure, will discourage foreign companies' willingness to locate plant and facilities in the United States. This reduction in investment would have a significant negative effect on manufacturing. Foreign direct investment in the manufacturing sector exceeded \$1 trillion for the first time in 2014, which equaled roughly half of value-added in the sector in that year. Overall, U.S. affiliates of foreign multinationals employed 5.8 million workers in 2012 (latest year available), accounting for 4.8 percent of private sector employment. Of this total, nearly 38 percent were employed in manufacturing, where the 2.2 million manufacturing workers employed at U.S. affiliates of foreign multinationals accounted for 18 percent of overall employment in manufacturing that year.

24. Thus, making the United States a comparatively more expensive location to operate a facility would have a more adverse effect on the manufacturing sector than other sectors of the economy, since manufacturing is more dependent on foreign investment than other sectors of the economy. In addition, reducing the competitiveness of the United States as a place to manufacture will have a negative long-term impact on the U.S. economy for another reason: productivity. In 2012, the latest year available, U.S. affiliates of foreign multinationals performed \$45.6 billion of Research and Development (R&D) activities, and 71.4 percent of this took place in manufacturing. This \$32.5 billion of R&D activities performed by U.S. manufacturing affiliates accounted for roughly 12 percent of the total R&D performed by all businesses in the United States. Reducing the United States' attractiveness as a location to manufacture will also have an adverse impact on R&D, which is a fundamental source of higher productivity, which leads to better quality employment and higher paying jobs for working Americans.

25. Based on the significant potential impacts that GHG regulation would have on the NAM's members, the NAM has actively engaged with the administration, Congress, and the courts on the ongoing debate related to climate change controls. This has involved providing extensive—and sometimes critical—comments on the range of GHG regulations that Defendants have proposed and finalized over the last several years. A selection of the NAM's administrative comments are available at <http://www.nam.org/Issues/Energy-and-Climate/EPA-Overregulation.aspx>.

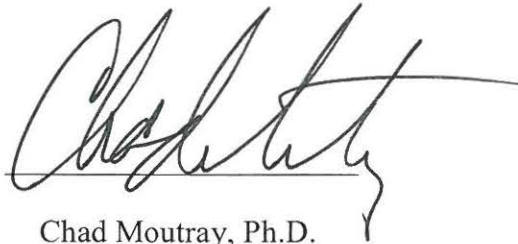
26. In addition, the NAM has been forced to challenge a number of Defendants' GHG regulations in court, including a number of the major rules issued by the Environmental Protection Agency to regulate GHG emissions. See

<http://lawcenter.nam.org/Results.aspx?idgroup=791.784.788.856.829.830.984.924.905.896.1020>  
.2098.

27. At the same time, the NAM is committed to working with Congress to establish climate and energy policies that will help the environment, while at the same time ensuring a reliable source of low-cost energy. It is critical to do so in a way that does not impose extraordinary burdens on our recovering economy and put manufacturers in the United States at a competitive disadvantage and jeopardize the very viability of the sector in the future.

In accordance with 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED this 10th day of November, 2015.



Chad Moutray, Ph.D.

# **Attachment 1**

# CHAD MOUTRAY, Ph.D., CBE

*Chief Economist, National Association of Manufacturers*

733 10<sup>th</sup> Street, NW, Suite 700  
Washington, DC 20001  
Work: (202) 637-3148  
cmoutray@nam.org  
@chadmoutray

7010 Devereux Circle Drive  
Alexandria, VA 22315  
Home: (703) 751-1027  
Mobile: (571) 243-6453  
chadmoutray@gmail.com

## PROFESSIONAL EXPERIENCES

### **National Association of Manufacturers (NAM),** *Washington, DC*

#### ***Chief Economist (April 2011 – Present)***

I am responsible for providing regular updates on the economy pertaining to the U.S. manufacturing sector, including regular briefings with senior NAM management, written analysis (e.g., blog posts, weekly economic reports to member companies, monthly columns and special surveys in our member magazine, quarterly surveys in collaboration with *IndustryWeek* magazine), and professional speeches. In addition, I work with others in the Policy & Government Affairs division to analyze regulatory and legislative actions to ascertain their impacts to manufacturers. I have worked closely with senior-level economists and other leaders from our member companies to gauge their views on the current state of the economy and policy as it relates to their businesses, and I have been highly engaged in briefing existing and prospective membership on economic trends.

### **Pinchfield Consulting & Analytics, LLC,** *Alexandria, VA*

#### ***President (April 2010 – April 2011)***

I conducted economic research and analysis for two clients: the International Franchise Association and the Ewing Marion Kauffman Foundation. This work included planning a conference on access to credit issues for franchisors and franchisees, writing a white paper on the importance of franchises, and contributing regular analysis to the Policy Dialogue on Entrepreneurship.

### **U.S. Small Business Administration (SBA),** *Office of Advocacy, Washington, DC*

#### ***Chief Economist (October 2002 – May 2010)***

#### ***Director of Economic Research (October 2002 – December 2010)***

This Director-level position reported directly to the Chief Counsel for Advocacy, a Presidential appointee confirmed by the U.S. Senate. I was directly responsible for the development and administration of the economic research agenda as it related to the role that entrepreneurs played in the economy and policy-relevant issues that were central to small business owners. I supervised seven economists and maintained a \$1.1 million research budget for contracted research and data. I was also responsible for increasing the awareness of the Office of Advocacy and its research. This included coordinated outreach with academics and policymakers and numerous speeches on small business economic trends. Beyond these duties, I also regularly provided updates on economic trends to the SBA Administrator, established a working paper series for internal research, and helped to organize several conferences.

### **Robert Morris College,** *Chicago, Illinois*

*(Now Robert Morris  
University of Illinois,  
effective May 2009)*

#### ***Dean, School of Business Administration (December 1997 – September 2002)*** ***Economics/Finance Faculty Member (September 1996 – September 2002)***

As Dean, I served in a Vice President-level position reporting directly to the Senior Vice President for Academics. The School of Business Administration was the largest academic division with 60 percent of the college's 5,000 students institutionally. I supervised 40 full-time faculty members and over 100 adjuncts. An Associate Dean assisted me with various projects including supervision of

<p><b>Kasem Bundit University,</b> Bangkok, Thailand</p> <p><b>John A. Logan Community College,</b> Carterville, Illinois</p> <p><b>Southern Illinois University,</b> Carbondale, Illinois</p> <p><b>Eastern Illinois University,</b> Charleston, Illinois</p>	<p>the adjunct faculty members. I was ultimately responsible for curriculum development and academic outcomes and oversaw seven curriculum chairs, the Director of the Business Institute, and facilitators of the school's assessment program. I maintained the academic budget of the business division and coordinated budgets of other academic divisions (in concert with the Senior VP) -- \$12 million overall.</p> <p>During my tenure, academic enrollment grew 50 percent, due mainly to new programs and the opening of additional campuses. Other accomplishments include creating an MBA program (which began accepting students after my departure in February 2006), creating and chairing advisory boards, and serving on the steering committees for college's regional accreditation renewal self-study. Effective May 2009, the college is now known as Robert Morris University of Illinois.</p> <p><b>Visiting Professor,</b> Economics/Finance (July – August 1997)</p> <p><b>Adjunct Faculty Member,</b> Economics &amp; Other Business Courses (August 1994 – May 1996)</p> <p><b>Teaching Assistant,</b> Economics (August 1992 – May 1996)</p> <p><b>Graduate Assistant,</b> Economics (August 1991 – May 1992)</p>
<p><b>Southern Illinois University,</b> Carbondale, Illinois</p> <p><b>Eastern Illinois University,</b> Charleston, Illinois</p> <p><b>Lake Land College,</b> Mattoon, Illinois</p> <p><b>National Association for Business Economics</b> Washington, DC</p>	<p><b>EDUCATIONAL BACKGROUND</b></p> <p><b>Ph.D., Economics (1996)</b> Fields of Concentration: International Trade &amp; Finance Monetary Economics Economics of Education (Untested) Dissertation: "Assessing the Performance of Market-Based Education Reforms"</p> <p><b>M.A., Economics (1992)</b> <b>B.A., Economics (1991)</b> – Graduated <i>summa cum laude</i> <i>Outstanding Graduate Alumni Award (2014)</i></p> <p><b>A.S., Business Administration (1989)</b> <i>Inducted in the Distinguished Alumni Society (2007)</i> <i>Alumnus Achievement Award (2015)</i></p> <p><b>Certified Business Economist™ (2015)</b> <i>Inducted as part of the inaugural class</i></p>

## PUBLICATIONS

Professional	<p>“Looking Ahead: Opportunities and Challenges for U.S. Manufacturers” with Kevin Swift. <i>Business Economics</i>, 48(2), April 2013.</p> <p>“Linking Franchise Success with Economic Growth and Net Job Creation.” White Paper. International Franchise Association. April 2011.</p>
SBA Office of Advocacy Publications	<p>“The Determinants of Rural and Urban County-Level Establishment Changes.” Working Paper. U.S. Small Business Administration, Office of Advocacy. 2011.</p> <p>“Educational Attainment, ‘Brain Drain,’ and Self-Employment: Examining the Interstate Mobility of Baccalaureate Graduates, 1993-2003.” Working Paper. U.S. Small Business Administration, Office of Advocacy. December 2009.</p> <p>“Start-up Resources Entrepreneurial Discontinuance: The Case of Nascent Entrepreneurs” with Jianwen (Jon) Liao and Harold Welsch. <i>Journal of Small Business Strategy</i>, 19(2), 2008/2009, 1-15.</p> <p>“Looking Ahead: Opportunities &amp; Challenges for Entrepreneurship and Small Business Owners.” <i>Western New England Law Review</i>, 31(3), 2009. pp. 763-780. (Also an SBA Advocacy working paper, October 2008.)</p> <p>“Baccalaureate Education and the Employment Decision: Self-Employment and the Class of 1993.” Working Paper. U.S. Small Business Administration, Office of Advocacy. October 2008.</p> <p>“Educational Attainment and Other Characteristics of Self-Employment.” Working Paper. U.S. Small Business Administration, Office of Advocacy. December 2007.</p> <p>“The Government’s Role in Aiding Small Business Federal Subcontracting Programs in the United States.” Working Paper with Major Clark, III, and Radwan Saade. U.S. Small Business Administration, Office of Advocacy. October 2006.</p> <p>“The Future of Small Businesses in the U.S. Federal Marketplace” with Major Clark, III. <i>Journal of Procurement Policy</i>, 4(3), 2004. pp. 450-470. (Also an Advocacy working paper, December 2004.)</p> <p>“Evaluating Performance in Chicago Public Schools in the Wake of Decentralization” with Shawna Grosskopf. <i>Economics of Education Review</i>, 20(1), February 2001. pp. 1-14.</p> <p><i>The Small Business Economy: A Report to the President</i>. Annual from 2001-2002 to 2010.</p> <p>— “The Small Business Economy.” Chapter 1. Annual from 2008 to 2010.</p> <p>— “Profile of Small Business and International Trade”. Chapter 4. 2008.</p> <p><i>Quarterly Indicators: The Economy and Small Business</i>. Quarterly from First Quarter 2004 to Third Quarter 2010.</p>
NAM Publications	<p><i>Monday Economic Report</i>. Weekly from April 2011 to present.</p> <p><i>Global Manufacturing Economic Update</i>. Monthly from October 2012 to present.</p>



**Personal**

*Member Focus* magazine. Monthly column from June 2011 to present.

*NAM Manufacturers' Outlook Survey*. Quarterly survey of member companies on the economy, Second Quarter 2011 to present.

*My Life with Laura: A Love Story*. Lulu Publishing (self-published memoir). 2008.

**SPEECHES AND PRESENTATIONS**

**Media Appearances**

Al Jazeera America  
Bloomberg Television  
CCTV Biz Asia News  
CNBC  
CNN  
Fox Business  
Fox News  
NPR  
PBS Nightly News  
Reuters Television

**Press Quotations**  
*(Highlights)*

*Associated Press*  
*The Hill*  
*McClatchy Newswires*  
*New York Times*  
*Wall Street Journal*  
*Washington Post*

**Congressional Testimony**

Small Business Subcommittee on Contracting and Workforce. "The Decline in Business Formation: Implications for Entrepreneurship and the Economy." September 11, 2014.

**Professional Speeches**  
*(Highlights)*

Chicago Association for Business Economics, Chicago, IL. November 2011.  
Chicago Council on Global Affairs, Chicago, IL. June 2011.  
Confartigianato Imprese, General Assembly, Rome, Italy. June 2007.  
George Washington University, Howard Hoffman Distinguished Lecture Series, Washington, DC. October 2008.  
Greater Houston Partnership, Houston, TX. December 2012.  
Governor's Entrepreneurial Business Conference, Wilmington, DE. June 2009.  
National Economists Club, Washington, DC. October 2004, January 2006, December 2006, December 2008, and September 2011.  
Richmond Association for Business Economics, Richmond, VA. May 2010 and October 2012.  
Robert Morris College, President's Leadership Forum, Chicago, IL. May 2003.  
Rotary Club of Washington, DC. December 2007 and February 2009.  
Shenandoah University, Byrd School of Business, Byrd Distinguished Lecture Series, Winchester, VA. October 2006.

*I have also given numerous presentations to various associations, providing them with an economic outlook and discussing relevant policies impacting their businesses.*

**Academic Conferences  
and Other  
Presentations**

"Baccalaureate Education and the Employment Decision." United States Association for Small Business and Entrepreneurship (USASBE) annual meeting. January 2009.

“Looking Ahead: Political Outcomes and Entrepreneurship Policy.” Western New England College of Law and Business Center for Advancing Entrepreneurship annual meeting. October 2008.

“Educational Attainment and Other Characteristics of the Self-Employed.”

— USASBE annual meeting. January 2008.

— Hudson Institute. December 2007.

Discussant, William Baumol Special Session on Entrepreneurship, Innovation, and Growth II: Empirical Approach. American Social Sciences Association meetings. January 2006.

Panelist, Workshop on Regulation. International Council on Small Business meetings. June 2005.

Chair, Panel Discussion on Small Business Data Sources. Eastern Economic Association meetings. February 2004.

Chair, Panel Discussion on Small Business Regulation. USASBE annual meeting. January 2004.

Chair, Panel Discussion on Data. Women’s Small Business Research Roundtable sponsored by U.S. Small Business Administration’s Office of Advocacy, Office of Women’s Business Ownership, and the National Women’s Business Council. March 2003.

“Evaluating Performance in Chicago Public Schools in the Wake of Decentralization” with Shawna Grosskopf. Presented at the Midwest Economic Association conference, March 1996; INFORMS conference, May 1996; and the Southern Economic Association meetings, November 1996.

Chair, “Issues in School Performance and Finance” session. Illinois Economic Association meetings. October 1996.

## OTHER ITEMS OF INTEREST

### Awards

Alumnus Achievement Award, Lake Land Community College, Mattoon, Illinois (2015)

Outstanding Graduate Alumni Award, Eastern Illinois University (2014)

Distinguished Alumni Society Member, Lake Land Community College, Mattoon, Illinois (Inducted April 2007)

Office of Advocacy Spot Awards (July 2005, September 2005, September 2006)

Eastern Illinois University Lumpkin School of Business Executive-in-Residence (November 2003)

### Memberships

American Economic Association

Conference of Business Economists

Harvard Industrial Economists Discussion Group

National Association of Business Economists (NABE)

National Economics Club

### Professional and Community Service

National Economists Club

- Board of Governors
  - Liaison with NABE, 2008
  - Chairman, 2010
  - Ex-Officio Member, 2011-2013)
- President, 2009

National Association for Business Economics

- Board of Governors (2009-2011)
  - Chapters Committee (Chair, 2010; Member, 2011)
  - Policy Survey Committee (Member, 2010; Chair, 2011)
- Manufacturing Roundtable (Chair, 2012-2013)
- Small Business & Entrepreneurship Roundtable (Chair, 2010)
- Get Connected Chapters Committee (Chair, 2008)

First Baptist Church of Alexandria

- Deacon (2009 – Present)
- Finance Committee (Secretary, 2010; Member, 2011-2012)
- FBCA Foundation Board (Member, 2011-2013)
- Capital Campaign Committee (Chairman, 2013–Present)

Oakland Hall at Cameron Station Condominium Association

- Board of Directors (Secretary, 2007; Member-at-Large, 2008)

Junior Achievement of the National Capital Area (2004–2005)

- Taught economics to T.C. Williams (Alexandria, Virginia) high school students

Midtown Educational Foundation (2000–2002)

- Tutoring/mentoring to an inner city student in various subjects from grade 4 through 6

---

*References Available Upon Request*

*\*\* Revised October 2015 \*\**

I hereby certify that I served the foregoing Declaration of Dr. Chad Moutray of the National Association of Manufacturers in Support of Proposed Intervenor-Defendants' Motion for Intervention on:

Julia A. Olson  
Wild Earth Advocates  
1216 Lincoln Street  
Eugene, Oregon 97401  
E-mail: juliaaolson@gmail.com

*Attorney for Plaintiffs*

Philip L. Gregory  
Cotchett, Pitre & McCarthy, LLP  
840 Malcolm Road  
Burlingame, California 94010  
E-mail: pgregory@cpmlegal.com

*Attorney for Plaintiffs*

Daniel M. Galpern  
Law Offices of Daniel M. Galpern  
1641 Oak Street  
Eugene, Oregon 97401  
E-mail: dan.galpern@gmail.com

*Attorney for Plaintiffs*

Justin Torres  
U.S. Department of Justice  
Environment & Natural Resources Division  
Natural Resources Section  
601 D. Street NW  
Washington, D.C. 20044  
E-mail: justin.torres@usdoj.gov

*Attorney for Defendants*

by the following indicated method or methods on the date set forth below:

- ☒ **CM/ECF system transmission.**
- ☐ **E-mail.** As required by Local Rule 5.2, any interrogatories, requests for production, or requests for admission were e-mailed in Word or WordPerfect format, not in PDF, unless otherwise agreed to by the parties.
- ☐ **Facsimile communication device.**
- ☐ **First-class mail, postage prepaid.**
- ☐ **Hand-delivery.**

DATED this 12th day of November, 2015.

/s/ C. Marie Eckert

C. Marie Eckert, P.C.  
Oregon State Bar No. 883490

*Of Attorneys for Proposed Intervenor-  
Defendants The National Association of  
Manufacturers, American Fuel &  
Petrochemical Manufacturers, and American  
Petroleum Institute*